2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	

1

MARGARET A. MCLETCHIE, Nevada Bar No. 10931

LEO S. WOLPERT, Nevada Bar No. 12658

MCLETCHIE LAW

602 South Tenth Street

Las Vegas, Nevada 89101

Telephone: (702) 728-5300; Fax: (702) 425-8220

Email: Efile@nvlitigation.com
Counsel for Plaintiff Jason Mathis

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

JASON MATHIS, an individual,

Plaintiff

VS.

66);

28

JACOB HOLGUIN, an individual; SAM QADERI, an individual; INGRID TRASCAN, an individual; CAREN QUIBA, an individual and DOE CORRECTIONAL OFFICER 5,

Case. No.: 2:20-cv-02171-CDS-MDC

STIPULATION AND ORDER TO EXTEND DEADLINE FOR PLAINTIFF'S RESPONSE IN OPPOSITION TO MOTION FOR SUMMARY JUDGMENT (SECOND REQUEST)

[ECF No. 69]

Defendants

Plaintiff Jason Mathis and Defendants Jacob Holguin, Ingrid Trascan, Sam Qaderi, and Caren Quiba, by and through their respective legal counsel (collectively the "Parties") hereby stipulate to the following:

- 1. On August 5, 2024, Defendants moved for summary judgment. (ECF No.
- 2. The deadline for Plaintiff's Response in Opposition to the Motion for Summary Judgment is currently September 25, 2024. (*See* ECF No. 68);
- 3. Although Counsel for Plaintiff has reviewed Defendants' Motion for Summary Judgment and supporting exhibits and has begun drafting a Response, due to various competing deadlines and family emergencies, Counsel for Plaintiff has not had sufficient time to complete the Response, and therefore, is unable to meet the September 25, 2024, deadline;
 - 4. As previously noted, Ms. McLetchie's mother passed away on July 29,

	5	Mo
	6	
	7	to
	8	ext
	9	
	10	De
	11	to
	12	20
	13	
ON.COM	14	
LITIGATI	15	fai
WWW.NVLITIGATION.COM	16	
	17	
	18	
	19	
	20	
	21	
	22	
	23	
	24	
	25	
	26	
	27	
	28	

1

2

3

4

2024, requiring Ms. McLetchie to devote subs	. Sam Qaderi, and Caren Quiba tantial time away from legal work to plan and
host her memorial, wind up her affairs, and de	al with her estate;

- 5. Ms. McLetchie and Mr. Wolpert were required to travel outside of the jurisdiction between September 19, 2024, and September 22, 2024, to plan and attend Ms. McLetchie's memorial service;
- 6. The Parties have met and conferred and agree that the deadline for Plaintiff to file his Response in Opposition to Defendants' Motion for Summary Judgment shall be extended by seven (7) days;
- 7. Accordingly, the deadline for Plaintiff's Response in Opposition to Defendants' Motion for Summary Judgment shall be rescheduled from September 25, 2024, to October 2, 2024; the deadline for Defendants' Reply shall be rescheduled from October 2, 2024 to October 9, 2024;
 - 8. This is the Parties' second request for an extension of this deadline;
- 9. The Parties both submit that the instant stipulation is being offered in good faith and not for the purpose of delay.

IT IS SO STIPULATED.

Dated this 24th day of September, 2024. Dated this 24th day of September, 2024.

MCLETCHIE LAW

By: /s/ Leo S. Wolpert Margaret A. McLetchie, Esq. Nevada Bar No. 10931 Leo S. Wolpert, Esq. Nevada Bar No. 12658 602 South 10th Street Las Vegas, Nevada 89101

Las Vegas, Nevada 89101
Attorneys for Plaintiffs

OFFICE OF THE ATTORNEY GENERAL

By: /s/ Leo T. Hendges
Leo T. Hendges, Esq.
Nevada Bar No. 16034
Victoria C. Corey, Esq.
Nevada Bar No. 16364
Office of the Attorney General
1 State of Nevada Way
Suite 100
Las Vegas, Nevada 89119
Attorneys for Defendants

	ı
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	

ORDER

Based on the parties' stipulation, the deadline for plaintiff's response in opposition to the motion for summary judgment is extended to October 2, 2024. The reply is now due on October 9, 2024.

Dated: September 25, 2024

UNITED STATES DISTRICT JUDGE